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Attorneys for Plaintiffs Moses T. and Qianyan S. Fejeran

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

MOSES T. FEJERAN and)	CIVIL ACTION NO. 05-0033
QIANYAN S. FEJERAN,)	
)	
Plaintiffs,)	
)	NOTICE OF MOTION
vs.)	TO AMEND COMPLAINT, ETC.
)	
AVIATION SERVICES (CNMI), LTD.)	Date: August 9, 2007
d.b.a. FREEDOM AIR,)	Time: 9:00 a.m.
)	Judge: Munson
Defendant.)	

PLEASE TAKE NOTICE that Plaintiffs, by and through counsel, will move to Amend their Complaint, for Leave to Conduct Discovery and Retain Expert and in the Alternative, to Prevent Defendant from Asserting the Doctrine of Air Worthiness as an Affirmative Defense on August 9, 2007, at 9:00 a.m. or as soon thereafter as the matter may be heard at the above courthouse. Such Motion shall be upon the Motion, Memorandum of Law, Declarations of Counsel with Exhibits and all prior pleadings and proceedings had herein.

Dated: July 13, 2007.

O'CONNOR BERMAN DOTT & BANES
Attorney for Plaintiffs Moses T. and
Qianyan S. Fejeran

By: _____/s/_____
GEORGE L. HASSELBACK.